



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

SEP 19 1983

MEMORANDUM

SUBJECT: Authorization to Proceed With Remedial Actions at
the Chemical Control Corporation Site, Elizabeth,
New Jersey -- ACTION MEMORANDUM

FROM: William N. Hedeman, Jr., Director *Bill Hedeman*
Office of Emergency and Remedial Response (WH-548)

TO: Lee M. Thomas, Assistant Administrator
Office of Solid Waste & Emergency Response (WH-562-A)

PURPOSE

The purpose of this memorandum is to request authorization to proceed with remedial actions at the Chemical Control Corporation in Elizabeth, New Jersey. It is the intent of the State to enter into a Superfund State Contract with EPA.

BACKGROUND

Chemical Control Corporation is considered a high priority site by the State of New Jersey and is ranked high on the National Priorities List. It is located in the City of Elizabeth in Union County, New Jersey.

This site was a hazardous waste storage, treatment and disposal facility which accepted various types of chemicals including acids, arsenic bases, cyanides, flammable solvents, polychlorinated biphenyls, compressed gases, biological agents, shock sensitive chemicals, pyrophoric materials and pesticides.

A huge fire on April 21, 1980 destroyed the site and necessitated a massive cleanup action which was initiated by the New Jersey Department of Environmental Protection (NJDEP). This cleanup action included removal of surface drums, bulk storage tanks, all buildings, contaminated soil and the installation of a ground water decontamination system. The site is currently enclosed by a chain link fence.



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Prior to and during the April 1980 fire, drums may have fallen into the Elizabeth River. The drums were stacked four high along the entire length of the site on the river bank. An investigation by the U.S. Coast Guard revealed the presence of metallic objects on the river bed along the site. During the initial clean-up operation several storm sewer catch basins were physically removed or damaged by heavy equipment. Other catch basins and manholes were sealed off with sand to prevent contaminated run-off water from entering the Elizabeth River and the Arthur Kill. This action has caused excessive flooding on South Front Street and the site itself, as well as potentially spreading the contamination now contained in the catch basins.

There are two hundred gas cylinders on site of questionable structural integrity as they have been damaged by burial and extremes of temperature. The exact contents of the cylinders are unknown, but they are believed to contain a variety of hazardous substances.

Five box trailers and a vacuum truck are contaminated with residual materials. The relocation of these vehicles is required to expedite the feasibility study. The vehicles will be decontaminated on-site and moved to a clean location.

COMMUNITY RELATIONS

An environmental fact sheet was prepared and distributed to local industries, citizens, and local politicians. It described the proposed studies and initial remedial measures for the site, the location of public documents available for review, and the commencement of a two-week public comment period on the proposed initial remedial measures.

The public comment period was held from August 17-31, 1983. All the public comments supported the plans for removal and disposal of the gas cylinders, reconstruction and cleaning of the storm sewer system, construction of curbing and decontamination of the six vehicles located on the site.

A public meeting will be held when the feasibility studies begin to develop the long-term cost-effective clean up alternatives for the suspected drums in the Elizabeth River and final site closure. Also, a public meeting will be held to discuss the alternatives developed and to select the proper course of action.

ENFORCEMENT - See Attached.

PROPOSED PROJECT

An initial remedial measure will be performed at the site which will include the removal of 200 gas cylinders of unknown composition for venting, analysis, and treatment at a RCRA approved treatment facility. Engineering and construction services will also be provided for the initial remedial measure of reconstruction of storm sewer catch basins and grates, cleaning of the storm sewer system, construction of curbing and decontamination of five box trailers and one vacuum truck on-site. The hazardous residue generated, from the cleaning of storm sewers and the decontamination of vehicles, will be transported off-site to a RCRA approved disposal site. The attached cost-effectiveness evaluation document and justification memorandum describe the analysis of remedial alternatives at the site.

A feasibility study will be undertaken to develop the long term cost-effective cleanup alternative for the suspected drums in the Elizabeth River. Another feasibility study will be undertaken to develop the long-term cost-effective alternative for final closure of the site. The latter study will not commence until the State of New Jersey submits a site summary report which is currently in preparation. Once this site summary report has been reviewed by EPA, a detailed scope of work for the feasibility study will be developed and implemented.

It is anticipated that the project will be completed twelve months after it is initiated.

Estimated Project Cost and Schedules

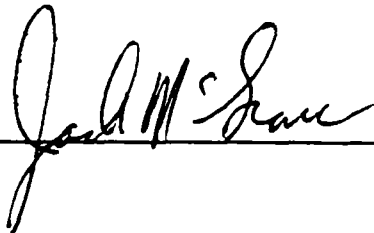
Feasibility Studies	\$200,000
Disposition of Drums	
Final Site Closure	
Design of Initial Remedial Measures	\$78,000
Contractor	\$42,000
Corp of Engineers	36,000
Initial Remedial Measures	\$504,500
Construction Contract	\$456,500
Corp of Engineers	48,000
Total	<u>\$782,500</u>

RECOMMENDATIONS:

I recommend approval to proceed with the above mentioned feasibility studies at Chemical Control Corporation.

I recommend that, Consistent with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), and the National Contingency Plan (40CFR PART 300), you determine that the selected option for the Chemical Control Corporation site is a feasible and cost-effective remedial action necessary to limit exposure to a significant health or environmental threat. The action being taken is also appropriate when balanced against the need to use Trust Fund money at other sites. In addition, I have determined that the off-site transport of hazardous substances to a RCRA approved landfill is more cost-effective than other remedial actions and therefore consistent with Section 101 (24) of CERCLA.

I am available to discuss the request in more detail at your convenience.


_____ Approve

_____ Disapprove

_____ 9-20-80 _____ Date

Attachment

ENFORCEMENT

In January of 1979, NJDEP issued an Administrative Order instructing the owners of Chemical Control to take steps toward eliminating the threat to the environment and to the population of the area. The NJDEP, through litigation, placed the Chemical Control Corporation in receivership in January, 1979. Both OWPE and OEC have released this site for the proposed remedial actions.

Criminal cases have been brought by both the Federal and State governments. The Federal government successfully prosecuted the owners and operator of the site for mail fraud. The State prosecuted the owners and operator for illegal dumping. Notice letters were issued to eight potentially responsible parties (owners/operators) on March 24, 1983, for the work described herein. No affirmative responses have been received to date. It is anticipated that the Federal government will ultimately initiate a cost recovery action for the approximately \$1 million in past expenditures under Section 311 of the Clean Water Act and for any future expenses incurred under CERCLA authorizations.